

MEMO ENDORSED



200 Old Country Road, Suite 2 South, Mineola, NY 11501/Tel: (516) 741-3222/Fax: (516) 741-3223

November 6, 2022

By ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10606

Re: Haughey v. The County of Putnam, et al, 18 CV 2861 (KMK)

Dear Judge Karas:

I represent Plaintiff William Haughey in this 42 U.S.C. § 1983 action stemming from Mr. Haughey's wrongful arrest, prosecution, and nine-year imprisonment. I write to respectfully request an adjournment of the telephone conference scheduled in this action for November 9, 2022, at 10:00 am to December 2, 2022. This is our first request for an adjournment of this conference.

I request this adjournment because I am actually engaged in trial in a Putnam County murder case *People v. Andrew Krivak*, from November 7, 2022, to December 15, 2022. Court is not in session on Fridays which is why I can be attend the conference on 12/2 or 12/9.

Counsel for Defendant the County of Putnam consents to our request. However, counsel for Defendant the Town of Carmel and counsel for Defendant Carmel Fire Chief informed us they would agree to our request only on the condition that Mr. Haughey consent to an extension of time for them to submit their reply brief (apparently to our opposition to their motion for reconsideration) until November 21, 2022. We do *not* agree to the Town and Chief Johnson's request for an extension, view it as dilatory, and thus have requested our extension without their consent.

The conference is adjourned to 12/2/22,
at 2:00 The reply dates will not be
moved.

So Ordered.

A handwritten signature in black ink, appearing to read "Oscar Michelen", with the date "11/7/22" written below it.

11/7/22

cc: All defense counsel by ECF

Respectfully submitted,

s/Oscar Michelen

Oscar Michelen